



Christopher James Bowes, Esq.

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August 10, 2021

Via ECF

Hon Barbara C. Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: Bajana v. Saul
20 Civ. 8864 (VEC)(BCM)

Dear Judge Moses:

I am writing to request an extension of time to submit plaintiff's settlement proposal to opposing counsel. Pursuant to the Court's Order, plaintiff is due to file this document within 30 days of the filing of the record. The record was filed on July 12, 2021 and plaintiff's settlement letter is due tomorrow.

I seek additional time due to significant workload that has bottlenecked all at once over the past four weeks, coupled with long-scheduled vacation time. With the consent of opposing counsel, SAUSA Shira Siskind, I respectfully request that the Court adopt the following revised briefing schedule:

August 31, 2021	Plaintiff's settlement letter
September 30, 2021	Stipulation of Dismissal or No Settlement Joint Letter
November 1, 2021	Plaintiff's Motion for Judgment on the Pleadings
January 5, 2022	Defendant's Motion for Judgment on the Pleadings
January 19, 2022	Plaintiff's Reply

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

Christopher J. Bowes, Esq.
Christopher J. Bowes, Esq.

cc: Shira Siskind, Esq.
Social Security Administration
Office of the General Counsel
26 Federal Plaza Room 3904
New York, NY 10278

Application GRANTED. SO ORDERED.

Barbara Moses
United States Magistrate Judge
August 11, 2021